### Louisiana Department of Environmental Quality (LDEQ) Office of Environmental Services

#### STATEMENT OF BASIS

Boise Building Solutions Manufacturing, LLC Alexandria Engineered Wood Products Facility Lena, Rapides Parish, Louisiana Agency Interest Number: 32742 Activity Number: PER20080001 Proposed Permit Number: 2360-00080-V6

#### I. APPLICANT

Company:

Boise Building Solutions Manufacturing, LLC 8835 Hwy 1 N Lena, Louisiana 71447

Facility:

Alexandria Engineered Wood Products Facility 8835 Hwy 1 N Lena, Rapides Parish, Louisiana 527600 mE 3473900 mN

#### II. FACILITY AND CURRENT PERMIT STATUS

Alexandria Engineered Wood Products Facility, an existing wood products manufacturing facility, began operation in 1996. Alexandria Engineered Wood Products Facility currently operates under Permit No. 2360-00080-V5, issued February 6, 2006.

Alexandria Engineered Wood Products Facility produces billets using two methods. One method begins with the purchase of dry veneer. Purchased dry veneer sheets are trimmed/scarfed, glued, and then layered to form a billet. Billets are transferred to a hot press that compresses the billets at elevated temperatures to solidify the glue and veneer layers. The second method is to purchase 4' X 8' sheets of consolidated parallel laminated veneer (PLV). These are joined together to form billets by finger jointing them on the narrow edge. Different engineered wood products are produced with the

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billets. Particulate emissions generated during billet preparation, waste hogging, and billet finishing are controlled with baghouses. Additional air emissions sources include I-assembly, LVL-assembly, a hot oil heater, lay-up line, diesel tank, glue tanks, crosslinker tanks, emulsion tanks, and a sealer tank.

#### III. PROPOSED PROJECT/PERMIT INFORMATION

#### **Application**

A permit application and Emission Inventory Questionnaire were submitted by Boise Building Solutions Manufacturing LLC on May 20, 2008, requesting a Part 70 operating permit renewal and minor modification.

#### **Project**

The modifications at the Alexandria Engineered Wood Products Facility include the following:

- Decrease glue usage in the Hot Press (EQT 2),
- Update PM10 emissions for the Hot Press (EQT 2),
- Replace the lay-up line,
- Lower the glue usage on the lay-up lines by decreasing the glue spread rate,
- Add two baghouses (EQT 16, 17),
- Update fugitive ink emissions using better vendor data,
- Add a 1 MMBtu/hr conditioning heater, and
- Replace a 2,000 gallon crosslinker tank with a 6,000 gallon crosslinker tank.

#### Proposed Permit

Permit 2360-00080-V6 will be the renewal and minor modification of Part 70 operating permit 2360-00080-V5 for the Alexandria Engineered Wood Products Facility.

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#### **Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	43.30	65.46	+ 22.16
$SO_2$	0.84	0.84	-
$NO_x$	23.83	23.83	-
CO	4.91	4.91	-
VOC	260.42	240.02	- 20.40

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (Tons/yr):

Pollutant	Before	After	Change
1,4-Dioxane	-	0.30*	+ 0.30
Acetaldehyde	-	0.30*	+ 0.30
Benzyl Chloride	-	0.03*	+ 0.03
Ethylene Glycol	27.45	31.83*	+ 4.38
Formaldehyde	9.43	6.88*	- 2.55
Glycol Ethers	3.42	30.16*	+ 26.74
Methanol	180.84	156.74*	- 24.10
Naphthalene	-	0.30*	+ 0.30
Phenol	13.48	9.43*	- 4.05
Toluene	9.63	8.99*	- 0.64
Vinyl Acetate	-	< 0.01	+ < 0.01

<sup>\*</sup>Emissions represent worst-case scenarios based on the type of sealer used.

Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (Tons/yr):

Pollutant	Before	After	Change `
Ammonia	0.43	30.15	+ 29.72
Hydrochloric Acid	-	< 0.01	+ < 0.01

Total 30.15

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#### IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.